

## **Exhibit A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TRUEPOSITION, INC.,

Plaintiff,

vs.

LM ERICSSON TELEPHONE COMPANY  
(TELEFONAKTIEBOLAGET LM ERICSSON),

QUALCOMM, INC.,

ALCATEL-LUCENT, S.A.,

THIRD GENERATION PARTNERSHIP  
PROJECT a/k/a 3GPP,

and

EUROPEAN TELECOMMUNICATIONS  
STANDARDS INSTITUTE,

Defendants.

Case No. 2:11-cv-4574

**DECLARATION OF SCOTT E. WOLFE IN SUPPORT OF  
DEFENDANT ALCATEL LUCENT'S MOTION TO DISMISS**

I, Scott E. Wolfe, declare as follows:

1. I hold the position of Secretary of Alcatel-Lucent USA Inc., a Delaware corporation ("Alcatel-Lucent USA"), and have held this position since June 1, 2008. I respectfully submit this declaration in support of Defendant Alcatel Lucent's Motion to Dismiss TruePosition, Inc.'s Complaint in the above-captioned action (the "Complaint").

2. As Secretary of Alcatel-Lucent USA, I have knowledge of the corporate structure of Alcatel-Lucent USA and its ultimate parent entity, Alcatel Lucent. Based on my own

experience and on information made available to me by others at the company, I have knowledge of certain aspects of the business of Alcatel-Lucent USA and Alcatel Lucent. One of my duties as Secretary of Alcatel-Lucent USA is to submit declarations such as this one in litigation in the United States involving Alcatel Lucent and its subsidiaries including Alcatel-Lucent USA.

3. Alcatel-Lucent USA Inc. is a Delaware corporation headquartered in Murray Hill, New Jersey. It has approximately 13,000 employees. Prior to November 1, 2008, Alcatel-Lucent USA Inc. existed as Lucent Technologies Inc. It was originally incorporated on November 29, 1995.

4. Alcatel Lucent is the ultimate parent entity of Alcatel-Lucent USA. Alcatel Lucent is a French *societe anonyme* organized under the laws of France, with its headquarters located at 3, avenue Octave Greard, 75007 Paris, France. Although plaintiff refers in the Complaint to a company named "Alcatel-Lucent S.A.," located at 3, avenue Octave Greard, 75007 Paris, France, I believe that to be an erroneous reference to this *societe anonyme*, the proper name of which is Alcatel Lucent.

5. Alcatel Lucent has fewer than 10 employees, all of whom currently reside in France.

6. Alcatel Lucent has no offices anywhere in the United States, and Alcatel Lucent does not directly own or lease any real property in the United States.

7. Alcatel Lucent does not manufacture, sell, offer to sell, or distribute products or services to any entity in the United States.

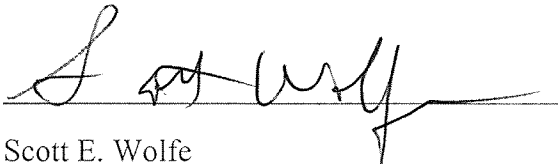
8. Alcatel Lucent does not contract to insure or act as surety of, or on, any personal property, risk, contract, obligation, or agreement located, executed or to be performed within the United States.

9. To the best of my knowledge, no Alcatel Lucent director, officer, or employee has attended any Third Generation Partnership Project ("3GPP") meetings relating to positioning system standards, and no Alcatel Lucent director, officer, or employee has participated in the formulation of positions taken by Alcatel Lucent or its subsidiaries at such meetings.

10. No Alcatel Lucent employee sits on the board of directors of Alcatel-Lucent USA Inc., and there are no common board members between Alcatel Lucent and Alcatel-Lucent USA Inc.

11. Alcatel Lucent does not exercise day-to-day direction or control over the routine operations of Alcatel-Lucent USA Inc.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6, 2011.



Scott E. Wolfe